TEITELBAUM LAW GROUP, LLC Attorneys at Law

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Jay Teitelbaum*

November 11, 2019

VIA ECF Hon. Katherine H. Parker United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

MEMO ENDORSED

Re: Essex Capital Corporation v. Vivek Garipalli, et al., No. 17-cv-6347-JFK-KHP

Dear Judge Parker:

My firm was recently substituted as counsel for Geoff Winkler as the Receiver appointed for Plaintiff, Essex Capital Corp. in the action pending in the United States District Court California Securities and Exchange Commission, Plaintiff v. Ralph Iannelli and Essex Capital Corp., et al, Defendants, 18-05008 (the "Receivership Action").

I am writing with the consent of counsel for Defendants to request a 60 day adjournment of all discovery deadlines and of the November 20 settlement conference.

The basis for the request is that the parties have reached agreement in principal on a settlement and require additional time (i) to document the settlement and (ii) for the Receiver to obtain approval of the settlement in the District Court Action.

APPLICATION GRANTED: In light the Parties' representation that a settlement in this matter has been Respectfully, reached, the Settlement Conference currently scheduled for November 20, 2019 is hereby adjourned sine die. All Discovery deadlines are hereby extended 60 days.

APPLICATION GRANTED

Respectfully,

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Cc: Michael Rato, Esq.

Hon. Katharine H. Parker, U.S.M.J. 11/12/2019

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